

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

MARC VEASEY, *et al.*,

Plaintiffs,

v.

Civil Action No. 2:13-cv-193 (NGR)

RICK PERRY, *et al.*,

Defendants.

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

Civil Action No. 2:13-cv-263 (NGR)

STATE OF TEXAS, *et al.*,

Defendants.

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

Civil Action No. 2:13-cv-348 (NGR)

STATE OF TEXAS, *et al.*,

Defendants

**DESIGNATION OF EXPERT WITNESSES BY TEXAS STATE  
CONFERENCE OF NAACP BRANCHES AND THE MEXICAN AMERICAN  
LEGISLATIVE CAUCUS OF THE TEXAS HOUSE OF REPRESENTATIVES**

Pursuant to Federal Rule of Civil Procedure 26(a)(2)(A) and to the Court's April 8, 2014, Amended Scheduling Order (ECF No. 231), Plaintiffs Texas State Conference of NAACP Branches ("Texas NAACP") and the Mexican American Legislative Caucus of the Texas House of Representatives ("MALC") designate the following individuals as expert witnesses:

1. Matt A. Barreto, Ph.D.  
Department of Political Science  
University of Washington  
Box 353530  
Seattle, Washington

Gabriel Ramon Sanchez, Ph.D.  
Department of Political Science  
University of New Mexico  
Box MSC05 3070  
Albuquerque, New Mexico

Dr. Barreto and Dr. Sanchez are designated as expert witnesses on behalf of the Veasey-LULAC Plaintiffs and Texas NAACP and MALC Plaintiffs. Dr. Barreto and Dr. Sanchez's joint report and other Rule 26 disclosures are being produced by the Veasey-LULAC Plaintiffs. The joint report addresses the results of a survey of Texas registered and eligible voters.

2. Lorraine Carol Minnité, Ph.D.  
Rutgers, State University of New Jersey-Camden  
Dept. of Public Policy & Administration  
401 Cooper Street, Rm. 102  
Camden, New Jersey

Dr. Minnité's report addresses the existence of voter fraud in Texas and nationwide. Dr. Minnité's report is designated "Highly Confidential" pursuant to the Consent Protective Order (Doc. #105) and has been filed separately under seal.

3. Daniel G. Chatman, Ph.D.  
Asst. Professor of City & Regional Planning  
University of California, Berkeley  
410A Wurster Hall  
#1850  
Berkeley, California

Dr. Chatman's report addresses transportation-related burdens on white, African American and Hispanic populations of obtaining an EIC. Dr. Chatman's report and other Rule 26 disclosures are produced herewith.

Plaintiffs Texas NAACP and MALC hereby cross designate and state that they may rely on any expert witness identified or designated by any other plaintiff or plaintiff-intervenor in this consolidated action.

Date: June 27, 2014

Respectfully submitted,

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*Counsel for Plaintiffs Texas State  
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American Legislative Caucus of the Texas  
House of Representatives*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 27, 2014, I served a true and correct copy of the foregoing via the Court's ECF system on all counsel of record.

/s/ Michelle Hart Yeary

Michelle Hart Yeary